



June 9, 2004

BY OVERNIGHT MAIL

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02110

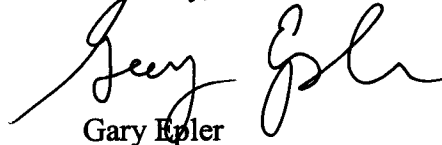
RE: D.T.E. 04-1: An investigation by the Department of
Telecommunications and Energy regarding the assignment of
interstate pipeline capacity pursuant to Natural Gas Unbundling,
D.T.E. 98-32-B (1999).

Dear Ms. Cottrell,

Enclosed for filing please find Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") responses to the First Set of Information Requests from the Department of Telecommunications and Energy ("Department") in the above-captioned filing, DTE-FG&E-1-1 through DTE-FG&E-1-13. One copy of a **Confidential** version of the responses is enclosed in a separate marked and sealed envelop; the remaining copies have been redacted. Also enclosed are the original and nine (9) copies of a Motion for Protective Treatment for data concerning pricing terms and supplier names provided in response to data requests DTE-FGE-1-1, 1-2, 1-3, and 1-7.

Thank you for your attention to this matter.

Sincerely,



Gary Epler

Enclosure

Corporate Office

6 Liberty Lane West
Hampton, NH 03842-1720

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Email: foote@unitil.com

cc: Caroline M. Bulger, Hearing Officer
Andreas Thanos, Assistant Director Gas Division (5)
Joseph Rogers, Assistant Attorney General (via Overnight Mail)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Investigation by the Department of Telecommunications and
Energy regarding the assignment of interstate pipeline
capacity pursuant to Natural Gas Unbundling,
D.T.E. 98-32-B (1999)**

D.T.E. 04-1

**MOTION OF FITCHBURG GAS AND ELECTRIC LIGHT COMPANY FOR
PROTECTIVE TREATMENT**

NOW COMES Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") and respectfully requests that the Department of Telecommunications and Energy ("Department") grant it protection from public disclosure for certain confidential and competitively sensitive information submitted in discovery responses made by Unitil in accordance with G.L. c. 25, § 5D. In support of this Motion, Unitil states:

1. Unitil requests protection from public disclosure the following information:
2. G.L. c. 25, § 5D is specifically designed to protect against disclosure of competitively sensitive information. That provision, in part, provides:

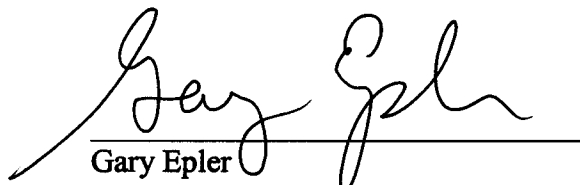
[T]he [D]epartment may protect from public disclosure, trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which protection is sought is public information and the burden shall be upon the proponent of such protection to prove the need for such protection. Where such a need has been found to exist, the [D]epartment shall protect only so much of the information as is necessary to meet such need.

3. Unitil submits that the provisions of this filing described above should be protected from public disclosure because this information is competitively sensitive

information concerning: Unitil's gas supply and storage contracts, including name of supplier and pricing terms provided in response to DTE-FG&E-1-1; transportation contracts including the name of a current transportation contractor and pricing terms provided in response to DTE-FG&E-1-2; the name of the asset/portfolio manager and the pricing terms of the contract provided in response to DTE-FG&E-1-3; the names of marketers, volumes transported and percentage of total Company sendout for the most recent heating season provided in response to DTE-FG&E-1-7. This information is normally not disclosed by Unitil, and Unitil takes steps to protect this information from public disclosure. This information reveals data and detail concerning Unitil's gas suppliers and marketers and may enable parties to use this normally undisclosed information to Unitil's or its customers disadvantage. Unitil submits that this information is well within the scope of "confidential, competitively sensitive or other proprietary information" contemplated by G.L. c. 25, § 5D, and accordingly, should be protected from public disclosure.

WHEREFORE, for all the reasons set forth in this Motion, Unitil respectfully requests that the Department issue an Order granting protective treatment to the provisions of the filing described above.

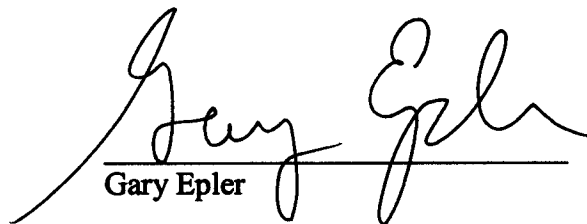
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary Epler", is written over a horizontal line.

Gary Epler
Senior Regulatory Counsel
Unitil Service Corp.
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Hampton, NH 03842
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Certificate

I certify that copies of this Motion for Protective Treatment has been served this 9th day of June, via overnight express mail, upon the Massachusetts Office of the Attorney General.



Gary Epler